

**REDACTED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA, )

v. )

TERRENCE ROSS  
aka "Turkman"

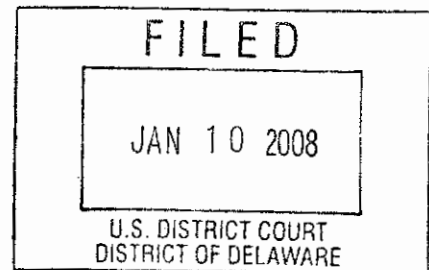
Defendant. )

**REDACTED**

) Criminal Action No. 08-05

**INDICTMENT**

The Grand Jury for the District of Delaware charges that:



**COUNT I**

On or about October 12, 2007, in the State and District of Delaware, TERRENCE ROSS, aka "Turkman," the defendant herein, did knowingly possess with the intent to distribute, more than fifty (50) grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

**COUNT II**

On or about October 12, 2007, in the State and District of Delaware, TERRENCE ROSS, aka "Turkman," the defendant herein, did knowingly possess with the intent to distribute a mixture and substance containing a detectable amount of, cocaine, a controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

**COUNT III**

On or about October 12, 2007, in the State and District of Delaware, TERRENCE ROSS, aka "Turkman," the defendant herein, did knowingly possess a firearm, that is a Smith and Wesson 12 gauge shotgun, serial number FS09874, in furtherance of a drug trafficking crime for which he

may be prosecuted in a court of the United States, to wit, the offenses described in Counts I and II of this Indictment, incorporated herein by reference, in violation of 18 U.S.C. § 924(c)(1)(A).

#### COUNT IV

On or about October 12, 2007, in the State and District of Delaware, TERRENCE ROSS, aka "Turkman," defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year on November 9, 1990, in the Superior Court for the State of Delaware, did knowingly possess in and affecting interstate commerce a firearm, that is a Smith and Wesson 12 gauge shotgun, serial number FS09874, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

#### FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Counts III or IV of this Indictment, defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the following: (1) a Smith and Wesson 12 gauge shotgun, serial number FS09874; (2) 1 box of 12 gauge shotgun shells; (3) 1 box of 16 gauge shotgun shells; and (4) 1 box of .22 caliber rim fire ammunition.

A True Bill

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Foreperson

COLM F. CONNOLLY  
UNITED STATES ATTORNEY

BY:

  
Ilana H. Eisenstein  
Assistant United States Attorney

Dated: January 10, 2008